

## CM11 – Children and Vulnerable Adults Safeguarding Policy

Nisai Group acknowledges the responsibility to ensure arrangements are in place to safeguard and promote the welfare of students. This follows the statutory guidance issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulation 2015, and the Education and Training (Welfare of Children) Act 2021.

The purpose of our Safeguarding policy at Nisai Group is to ensure that we:

- Are committed to developing a robust safeguarding culture of vigilance and challenge.
- Build resilience by raising awareness of safeguarding and child protection issues, and equipping students with the language and skills to keep themselves safe.
- Establish a safe environment in which students can learn and develop within an ethos of openness and where they are taught to treat each other with respect, to feel safe, to have a voice and know that they will be listened to.
- Prevent unsuitable people from working with our students by ensuring we practice safe recruitment in checking the suitability of all employees to work at Nisai Group and maintain an active, ongoing vigilance in line with the safeguarding culture.

Our aim is to follow the procedures detailed in “Keeping Children Safe in Education” (KCSIE) Statutory Guidance and Working Together to Safeguard Children 2023 by knowing and understanding that:

- Safeguarding and promoting the welfare of students is everyone’s responsibility
- Everyone who comes into contact with students and their families has a role to play.
- Everyone should ensure that their approach is student-centred considering, at all times, what is in the best interests of the student
- By establishing a safe environment, we enable our students to learn and develop within an ethos of openness.
- No single practitioner can have the full picture of a child’s needs and circumstances.
- If students and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- The importance of providing crucial information via our wellbeing centre on topics such as healthy relationships, online safety, sexting, child-on-child abuse as well as ‘abuse outside the home’, County Lines, Child Criminal Exploitation incl Child Sexual Exploitation and other contextualised safeguarding issues and have a balanced curriculum offer available for customers to enroll students on including PHSE
- Undertaking the role to enable Students at Nisai to have best outcomes.
- Ensuring that we have awareness of our staff’s knowledge and understanding, as well as embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our practice.

### Our Ethos and Culture

Our student's welfare is of paramount importance to all of us at Nisai Group. We understand our statutory duty to safeguard and promote the welfare of our students and we maintain a professional attitude of ‘it could happen here’ where safeguarding is concerned. We expect ALL staff to share our commitment, maintaining a safe environment and a culture of vigilance. Our staff, in their day-to-day contact with students and their families/carers, have a crucial role to play in noticing indicators of possible abuse, neglect or exploitation and ensuring that this is escalated to the appropriate agency via the referring customer.

Everyone has a responsibility to act without delay to protect students, by reporting anything that might suggest a child is being abused, neglected or exploited. We work in partnership with our customers, families and other agencies to improve the outcomes for children who are vulnerable or in need.

All staff are encouraged to report any concerns that they have and not to see these as insignificant. On occasions, an escalation to the customer is justified by a single welfare incident. However, concerns can accumulate over time and in conjunction with local awareness, this can build a picture of harm, particularly true in cases of abuse or neglect.

We acknowledge the three principles that as professionals we should follow when working with parents and carers:

- effective partnership and the importance of building strong, positive, trusting and co-operative relationships
- respectful, non-blaming, clear and inclusive verbal and non-verbal communication that is adapted to the needs of parents and carers
- empowering parents and carers to participate in decision making by equipping them with information, keeping them updated and directing them to further resources

We recognise the stressful and traumatic nature of safeguarding and child protection work, and support our staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate.

This policy:

- is available on our website and on request.
- will be reviewed in full by the Governing Body on an annual basis or sooner should legislation/guidance change.
- sets out how the governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of students at Nisai. Our policy applies to all staff including Governors.
- is provided to all staff on an annual basis and for new employees at the start of their employment, alongside our Staff code of conduct policy and KCSIE Part One and Annex A. Staff are required to sign a document confirming they have read and understood this guidance and will be kept on central files by HR manager.

Our policy applies to all staff working at Nisai Group, including teachers, mentors, administration, technical support and salespeople who may come into contact with pupils, all of whom can be the first point of disclosure for a child. Concerned parents/carers may also contact us directly.

### **Definition:**

Child: A young person under the age of 18.

An Adult at risk: An adult at risk is an individual aged 18 years and over who:

- (a) has needs for care and support (whether or not the local authority is meeting any of those needs) AND
- (b) is experiencing, or at risk of, abuse, neglect and exploitation, AND;
- (c) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse, neglect and exploitation.

The Principles of Adult Safeguarding England (Care Act 2014)

The Act's principles are:

- Empowerment - People being supported and encouraged to make their own decisions and informed consent.
- Prevention – It is better to take appropriate action before harm occurs.
- Proportionality – The least intrusive response appropriate to the risk presented.
- Protection – Support and representation for those in greatest need.
- Partnership – Communities have a part to play in preventing, detecting and reporting neglect, abuse and exploitation.
- Accountability – Accountability and transparency in delivering safeguarding.

### **Nisai Staff Involved with Safeguarding Responsibilities**

DSL for Nisai Provisions:

Nisai Virtual Academy (NVA) DSL - Victoria Reaney

Email: [victoria.reaney@nisai.com](mailto:victoria.reaney@nisai.com)

Telephone: 0208 424 8475 Ext. 3030

Nisai Virtual Academy (NVA) DSL - Karina Eldrett

Email: [karina.eldrett@nisai.com](mailto:karina.eldrett@nisai.com)

Telephone: 0208 424 8475 Ext. 3020

Nisai Personalised Learning Support Programme (PLSP) - Sara Baldry

Email: [sara.baldry@nisai.com](mailto:sara.baldry@nisai.com)

Telephone: 0208 424 8475 Ext.5013

Our staff have received the appropriate safeguarding training to provide them with an understanding of their role and the knowledge and skills to carry it out. The DSL and their deputies will attend all staff training and undertake additional formal training at least every two years. The Safeguarding Team will keep themselves up to date throughout the year (for example meetings with other DSL, via e-bulletins, CASPAR, local authority networking webinars and keeping up to date with safeguarding developments).

### **Raising concerns:**

In all instances, Nisai will escalate all disclosures and concerns immediately to the main Customer Contact who arranged/commissioned the Nisai provision for the student. The customer should then initiate their own Safeguarding Protocols.

In the event of the inability to reach the Customer Contact then we would contact the person responsible for Safeguarding within the referring school or from the specific Local Authority. If a student is home educated and the parent/carer is the customer contact, if a disclosure or concern is about parent/carer funding the provision, we would escalate directly to the person responsible for Safeguarding within the student's local authority.

## **There are four main elements to our policy:**

**Prevention** through the teaching and pastoral support offered to students and the creation and maintenance of a protective and secure ethos.

**Procedures** for identifying and reporting cases, or suspected cases of abuse.

**Support to Students** who may have been abused.

## **Preventing unsuitable people from working with our Students.**

### **Prevention**

We recognise that high self-esteem, confidence, supportive friends and good communication with a trusted adult, help to protect children.

Nisai Group will therefore:

1. Establish and maintain an ethos where students feel secure and are encouraged to talk and are listened to.
2. Ensure students know that there are adults at Nisai whom they can approach if they are worried or in difficulty.
3. Include information and guidance within the Nisai Virtual Academy Student Portal about who to turn to for help.
4. Include examples of staying safe online and give clear lines of communication to responsible persons (parents/carers, tutors) if any suspicion is aroused.
5. Ensure students have access to and are able to complete and understand the "E-Safety" course provided by Nisai.

### **Procedures**

We acknowledge that a member of our senior management team will take on the role of Designated Safeguarding Lead

This Senior Member of Staff will ensure that they:

1. Have undertaken as a minimum, a two-day child protection training course
2. Ensure this training is updated every two years in accordance with government guidance.
3. Recognise the importance of the role of the DSL and ensure they have the time and training to undertake their duties.
4. Ensure there are contingency arrangements, should the designated member of staff not be available.
5. Ensure that ALL such suspected cases are reported to the referring customer contacts.
6. Ensure, on an annual basis, that a review of the Safeguarding procedures are compliant with any new legislation and to the highest standards.
7. Ensure all members of Nisai Group Board receive annual Safeguarding training in line with KCSIE advice.

The Role of the Senior Management Team will be to ensure that employees will:

1. Know the name of the designated members of the team and their role.
2. Know that they have an individual responsibility for escalating concerns using the proper channels and within appropriate timescales.
3. Know and understand Nisai Group Safeguarding procedures.
4. Provide training for all staff from the point of their induction, and updated every two years at a minimum, so that they know:
  - their personal responsibility,
  - the need to be vigilant in identifying cases of abuse
  - how to support and to respond to a child who tells of abuse
5. Undertake appropriate discussion with the customer prior to involvement of another agency unless the circumstances preclude this.
6. Ensure that all staff recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to students, and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.

## **Liaison with Other agencies**

Nisai will:

Work to develop effective links with the Customers and relevant agencies and co-operate as required with their enquiries regarding safeguarding matters including attendance and written reports at initial case conferences, core groups and child protection review conferences.

Notify the Customer:

- If we should have to exclude a student on the child protection register (whether fixed term or permanently).
- There is an unexplained absence of a student on the child protection register of more than two days duration from Nisai (or one day following a weekend); or as agreed as part of any child protection or core group plan.
- To establish and maintain good understanding of local Safeguarding Boards and comply with all local requirements relating to procedures and contacting key personnel.

## Record Keeping

Nisai will:

- Keep clear detailed written records of concerns about students (noting the date, event and action taken), even where there is no need to refer the matter to the customer immediately.
- Ensure all records are kept.

## Confidentiality and information sharing

- Staff will ensure confidentiality protocols are adhered to, and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from a senior manager.
- The CEO or DSL will disclose any information about a student to other members of staff on a need-to-know basis only.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- All staff must be aware that they cannot promise a child to keep secrets.

## Communication with Parents

Nisai will ensure that parents understand the responsibility placed on Nisai Group and staff for child protection by setting out its obligations on the Nisai web site.

## Supporting the Student at Risk

All children should be protected however, we at Nisai Group recognise that some groups of children are potentially at greater risk of harm than others. This list is not exhaustive but highlights some of these groups:

- Children who need a social worker (Child in Need & Child Protection)
- Children missing from education
- Elective Home Education (EHE)
- Children requiring mental health support
- Looked after children and previously looked after children
- Children with special educational needs & disabilities/health issues

Paragraphs 170-204 of Keeping Children Safe 2024 explain in more detail about these groups. We support these groups by being:

- Vigilant
- Understanding
- Stable
- Respectful
- Informative and engaging
- Supportive.

At Nisai Group, we know that the cohort of pupils in our provision often have complex needs, we are aware of this additional risk of harm that our pupils may be vulnerable to. The updated DfE Guidance clarifies that when a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth and they may feel helplessness, humiliated and have some sense of self-blame. Nisai may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, when learning, their behaviour may be challenging and defiant or they may be withdrawn.

We recognise that some children adopt abusive behaviors and that this must be escalated to the referring customers who can then facilitate appropriate support and intervention.

Nisai will endeavor to support the students through:

1. The content of the curriculum to encourage self-esteem and self- motivation.
2. The Nisai ethos which (i) promotes a positive, supportive and secure environment (ii) gives students a sense of being valued.
3. Nisai's behaviour policy is aimed at supporting vulnerable students. All staff agree on a consistent approach, which focuses on the behaviour of the offence committed by the student but does not damage the student's sense of self-worth. Nisai will ensure that the student knows that some behaviour is unacceptable, but they are valued.
4. Liaison with the Customer and other agencies which support the student such as Social Services, Child and Adolescent Mental Health Services, the Educational Psychology Service, Behaviour Support Services and the Education Welfare Service when requested.
5. A commitment to develop productive and supportive relationships with parents whenever it is in a student's best

- interest to do so and with agreement of the Customer.
6. Recognition that children living in a home environment where there is domestic violence, drug or alcohol abuse are vulnerable and in need of support and protection.
  7. Vigilantly monitoring children's welfare, keeping records and notifying the Customer as soon as there is a recurrence of a concern.
  8. Recognise that grooming of children is becoming an increasing area of concern, and that all staff are aware of techniques employed by such predators and can report their suspicions to the DSL in a professional and confidential manner.
  9. Treat all allegations of child-on-child abuse swiftly and decisively.
  10. Fully investigate any allegation made about staff and senior managers direct to the local LADO, or in extreme circumstances, to the Police.
  11. Identify any changes in a child's mental health, and take appropriate action, including the prompt escalation to the referring Customer.
  12. Nisai have appropriate filtering and monitoring systems in place and regularly review their effectiveness.

## **Preventing Unsuitable People from Working with Children**

We take all possible steps to safeguard our students and to ensure that the adults who work at Nisai Group are safe to work with our students. We pay full regard to 'Keeping Children Safe in Education 2024'. Departmental Managers have undertaken appropriate training in Safer Recruitment with the NSPCC and at least one person on the interview panel will have completed this training and have the awareness of interview techniques and requirements.

Our Safer Recruitment and selection practice includes scrutinising applicants, verifying identity, checking academic or vocational qualifications, obtaining professional references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks, prohibition checks whether they are known to the police and/or social care. Evidence of these checks is recorded on our Single Central Record. All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of pupils.

## **Managing Allegations against Staff**

We take all possible steps to safeguard our students and to ensure that all adults at Nisai are safe to work with children. At Nisai, we promote an open and transparent culture in which all concerns about adults are dealt with promptly and appropriately. Creating this culture enables us to identify inappropriate, problematic, or concerning behaviour early, minimising the risk of abuse and ensuring that all staff are clear about professional boundaries and act within them in accordance with our ethos and values. We will ensure that all staff are aware of the need for maintaining appropriate and professional boundaries in their relationships with students and parents.

Our staff are aware that sexual relationships with students are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of position of trust).

If an allegation is made or a low-level concern is highlighted, or information is received about an adult who works at Nisai either from situations within the workplace or externally (transferable risk) which indicates to us that they may be unsuitable to work with children, the member of staff receiving the information should inform the Nisai CEO immediately. Should a customer have a concern about a member of Nisai staff then they should contact [safeguarding@nisai.com](mailto:safeguarding@nisai.com) in the first and immediate instance or contact 0208 424 8475 and ask to speak to the DSL.

If it is about the sole proprietor of Nisai then this needs to be raised with the Designated Safeguarding Lead or Chair of Governors for Nisai Group.

The DSL will then seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO. Any member of staff who does not feel confident to raise their concerns with the Nisai CEO or Chair of Governors should contact the LADO directly.

Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police. We understand that if we are not the employer of an individual, we still have responsibility to ensure allegations are dealt with appropriately.

We have ensured that there is a whistleblowing policy and staff are aware of this policy and understand its content. We have a culture where staff can raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with agreed whistleblowing procedures.

Additionally, the NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding safeguarding failures internally. Staff can call: 0800 028 0285 – the line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### What is a low-level concern?

Low level does not mean that the concern is insignificant. It is any concern, no matter how small, and even if no more than causing a sense of unease or nagging doubt that an adult working at Nisai may have acted in a way that is:

- inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

All staff have a good understanding of what constitutes a low-level concern, and we ensure that these low-level concerns are included as part of our staff code of conduct and safeguarding policies.

### Sharing low-level concerns

We understand how crucial it is that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively will also protect those working in or on behalf of our setting from potential false allegations or misunderstandings.

If we are in any doubt as to whether information shared about a member of our staff as a low-level concern in fact meets the harms threshold, we will consult with the LADO.

Nisai has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at Nisai, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. The DSL has a responsibility to inform Barring service. All actions must be compatible with UK GDPR regulations.

We will ensure that any disciplinary proceedings against staff relating to safeguarding are concluded in full even when the member of staff is no longer employed at Nisai, and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

## **Definitions and Indicators of Abuse**

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect
- Affluent neglect

## Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.
- An injury that is not consistent with the account given.
- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or
- Isolation from peers.

## Sexual Abuse

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age / stage of development
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.
- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Bruises or scratches in the genital area.

## Emotional Abuse

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes themselves in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.

- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug, or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

### Parental response

Research and experience indicate that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed.
- Unawareness or denial of any injury, pain, or loss of function (for example, a fractured limb).
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to their age and development.
- Reluctance to give information or failure to mention other known relevant injuries.
- Frequent presentation of minor injuries.
- A persistently negative attitude towards the child.
- Unrealistic expectations or constant complaints about the child.
- Alcohol misuse or other drug/substance misuse.
- Parents request removal of the child from home; or
- Violence between adults in the household.
- Evidence of coercion and control.

### **Specific Safeguarding Issues**

All staff have an awareness of safeguarding issues that can put students at risk of harm. Presenting behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including the link to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

#### **Drug Use and Child Protection**

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crime to support 'habits' and increased risk of being a victim of violent crime and criminal exploitation, including sexual exploitation. Nisai will ensure that the customer is alerted of any findings or reports. We will escalate all concerns to customers when the academy receives reliable information about drug and alcohol abuse by a child's parents/carers.

#### **Mental Health**

All staff have an important role to play in supporting the mental health and wellbeing of our pupils and are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

#### **Prevent, Radicalisation and Extremism**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

At Nisai Group, we value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Pupils/students and school staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.

Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Nisai Group is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the school's safeguarding duty.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

## **Prevent Duty and Channel**

All schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty and is part of our schools/colleges wider safeguarding obligations.

Designated safeguarding leads and other senior leaders familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and covers childcare). We follow the guidance in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

## **Channel**

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. The aims are:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.
- Schools have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Radicalisation is the process by which individuals come to support terrorism or violent extremism. There is no typical profile for a person likely to become involved in extremism, or when they move to adopt violence in support of their particular ideology.

Although several possible behavioural indicators are listed below, staff should use their professional judgement and discuss with the DSL if they have any concerns:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

Nisai recognises the positive contribution it can make towards protecting its students from Radicalisation to violent extremism. Nisai will continue to empower its students to create communities that are resilient to extremism and protecting the well-being of students who may be vulnerable to being drawn into violent extremism or crime. It will also continue to promote the development of spaces for free debate where shared values can be reinforced.

**So called 'honour-based' abuse - which includes FGM, Forced Marriage and Breast Ironing:** encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of honour-based abuse are abuse (regardless of the motivation) and should be handled and escalated as such. Staff need to be alert to the possibility of a child being at risk of honour-based abuse, or already having suffered honour-based abuse.

Staff must inform the DSL if they have concerns about a child.

## Female Genital Mutilation (FGM)

FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. It is known by several names including “cutting”, “female circumcision” or “initiation”.

The term female circumcision suggests that the practice is like male circumcision, but it bears no resemblance to male circumcision, and it has serious health consequences with no medical benefits. FGM is also linked to domestic abuse, particularly in relation to “honour-based abuse”.

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either via disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It is rare to see visual evidence, and children should not be examined but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless there is good reason not to, they should still consider and discuss any such case with the DSL (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where staff do not discover that FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff will follow local safeguarding procedures. This is the description of surgical total or partial removal of external female genitalia or other injury to the genital organs for non-medical reasons and is a violation of the human rights of girls and women. The World Health Organisation has been highly critical of the practice, and it was prohibited by the Female Genital Mutilation Act (2003) c.31. If a child under the age of 18 discloses to a member of Nisai Staff, then this must be escalated to the DSL immediately who then must inform the customer or call the Police using 101 number.

## Breast Ironing

This is where young pubescent girls’ breasts are ironed, massaged and/or pounded down using hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. The custom uses large stones, a hammer or spatulas that have been heated over scorching coals to compress the breast tissue, or an elastic belt to press the breasts to prevent them from growing in girls as young as 9 years old. Much like Female Genital Mutilation (FGM), breast-ironing has been identified by the UN as one of five under-reported crimes relating to female-to-female/gender-based violence.

The practice is performed usually by mothers and female relatives, and it is believed that by carrying out this act:

- young girls will be protected from harassment, rape, abduction
- it will prevent early pregnancy that would tarnish the family name
- it will allow the girl to pursue education rather than be forced into early marriage
- it will delay pregnancy by “removing” signs of puberty
- girls may not appear sexually attractive to men

Most at risk: Young pubescent girls usually aged between 9 – 15 years old. It is a well-kept secret between the young girl and her female relatives who are likely to carry out the practice.

## Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. The threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Some perpetrators use perceived cultural practices, to coerce a person into marriage. Schools and colleges play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person’s parents, extended family, or members of their community, could put the young person in a situation of significant risk.

Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously by professionals who should also realise that this could be ‘one chance to save a life’. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual, and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

From February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

The Forced Marriage (Civil Protection) Act 2007 was introduced to prevent young people from being forced into marriage without their free and full consent. Any suspicions from actions or disclosure should be reported to the Forced Marriage Unit (FMU) on 0207 0080151.

### **Handling a nude or semi-nude image or video incident:**

In the event of a student disclosing an event of this nature, the DSL should escalate and report to the customer at the earliest opportunity.

The guidance relates to the taking, sending or sharing indecent, sexually explicit images or videos of children (under the age of 18). This may be via social networking sites and instant messaging apps and services.

Behaviours linked to consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Nisai and staff are clear that nude images or videos of children are illegal. It may have extremely damaging and long-lasting consequences. Nisai understands that not all incidents are as a result of grooming by a perpetrator, and that some incidents are initiated by the child, as a demonstration of body confidence, body positivity, or maybe as part of an age-appropriate relationship. Nisai have a responsibility to work with children, their parents and carers in ensuring that all pupils are fully aware of the risks, dangers and possible repercussions of sharing nude images and videos.

In the event of a student advising a member of Nisai staff of an incident of this nature, this disclosure must be reported to the Customer by the DSL at the earliest opportunity.

The Nisai staff member **should NOT** view the imagery. They should advise the student that they will be alerting the Customer and reassure the student that they will be supported, and appropriate action taken.

### **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

Close relatives are defined as a grandparent, brother, sister, uncle, or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending a school away from their home area.

Our staff at Nisai will notify the DSL when they become aware of a private fostering arrangement who will then escalate this to the referring customer who then have a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

### **Domestic Abuse**

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people, can also occur within their personal relationships, as well as in the context of their home life. We will signpost and support our children/young people.

### **Upskirting**

Upskirting occurs when someone takes a picture under a person's clothing (not necessarily a skirt) without permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

In the event of a student disclosing an event of this nature, the DSL should escalate and report to the customer at the earliest opportunity.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

CSE and CCE do not always involve physical contact; it can also occur through the use of technology.

Nisai staff will ensure that any suspicion or disclosure of events relating to CSE/CCE are reported to the DSL who will then report all findings to the Customer or in extreme cases, the Police.

### **Child Criminal Exploitation (CCE)**

CCE can include children being forced or manipulated into transporting drugs or money through county lines to work in cannabis factories, forced to shoplift or pickpocket, or to threaten other young people.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.
- children who suffer from changes in emotional well-being.
- children who misuse drugs and alcohol.
- children who go missing for periods of time or regularly come home late.
- children who regularly miss school or education or do not take part in education.

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year-olds who can legally consent to have sex. Some children may not realise they are being exploited, e.g., they believe they are in a genuine romantic relationship.

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines criminal activity in a number of locations including schools, colleges, pupil referral units, special educational needs schools, children's homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes, (both from home and school).

Staff must inform the DSL if they have concerns about a child.

### **Missing/Absent From Education**

A child going absent/missing from education, particularly repeatedly and/or for prolonged periods, is a potential indicator of abuse or neglect. All staff are aware that children who are absent, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation/county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage.

It is important that Nisai's response to persistently absent pupils and children missing education is proactive and supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Our customers receive an automated non-attendance alert for when students do not attend a live scheduled online lesson. For PLSP students, customers receive a weekly report which would include absences or the inability to visit.

Nisai customers and parents can see live attendance data and additionally attendance concerns are escalated by the Customer and Student Support Team direct to the referring customer.

### **Missing from Home or Care**

There are strong links between children involved in criminal and sexual exploitation and other behaviors such as running away from home, care or school, bullying, self-harm, teenage pregnancy, truancy, and substance misuse. In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children. Most children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

### **Child-on-Child abuse (including Sexual violence and sexual harassment)**

Child-on-child abuse can occur, both physically and verbally, either online or face to face, between children of any age and sex, with a single child or group of children. Children who are victims of this abuse, will find the experience stressful and distressing and it is likely to have an adverse effect on their educational attainment. This type of abuse can exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

All Nisai staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls.

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Nisai staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys".
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Staff must inform the Designated Safeguarding Lead if they have concerns about a child.

All staff know that if we do not challenge and support our children that this will lead to a culture of unacceptable behaviors, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

We know that the initial response to a report from a child is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe.

All victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of Nisai will not be downplayed and will be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. We will ensure that students know that the law is in place to protect them rather than criminalise them, and will be explained in such a way that avoids alarming or distressing them.

Staff are aware of the groups that are potentially more at risk as evidence shows that girls, children with SEND and LGBT children are at greater risk. The DfE states that child on child abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

All staff understand, that even if there are no reports in our setting, this does not mean that it is not happening outside of Nisai, it may be the case that it is just not being reported by the victim. As such it is important that if staff at Nisai have any concerns regarding child-on-child abuse, they speak to their Designated Safeguarding Lead (DSL) or deputy (DDSL).

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence such as rape, assault by penetration and sexual assault and may include an online element which facilitates, threatens and/or encourages sexual violence. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery). Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal whilst non-consensual is illegal and abusive.
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

## **Signs and Indicators of Abuse, Neglect or exploitation in Adults**

An adult may confide to a member of staff within Nisai or a fellow student that they are experiencing abuse. Similarly, others may suspect that this is the case. There are many signs and indicators that may suggest someone is being abused or neglected. There may be other explanations, but they should not be ignored. The signs and symptoms include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Belongings or money going missing.
- Changes in attendance. You may notice that a student has been absent from classes and is not responding to correspondence from staff.
- Someone losing or gaining weight / an unkempt appearance.
- A change in the behaviour or confidence of a person.
- Self-harm.
- A fear of a particular group of people or individual.
- A parent/carer always speaks for the person and doesn't allow them to make their own choices.

## **Online Safety – including filtering and monitoring**

Nisai have appropriate filtering and monitoring systems in place and regularly review their effectiveness. We are directly responsible for ensuring we have the appropriate level of security protection procedures in place in order to secure our systems, staff and students and we review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

For the Nisai systems and student portal, Nisai Virtual Academy, security is a fundamental part of the whole Nisai structure. When creating our systems and applications we carry out an intensive preparation and research process which involves all aspects of online learning, access and security. We consider who will need access to our systems, for what purposes and the different permission requirements for different staff roles. We evaluate any potential risks for students and for staff and for data security purposes.

Nisai systems, infrastructure and networks are regularly monitored and maintained with regular risk assessments and security deployments being installed. All processes are regularly reviewed, updated and shared as and when necessary.

To access Nisai, students need a computer/laptop or tablet and an internet connection. These are not provided by Nisai as standard, and students use their own machines which are either provided by their own school or families. Customers/families should ensure that students have all the correct applications such as virus protection, security and any parental controls based on the age range of the student.

If a student leases a laptop from Nisai then this is secured/locked down and has filtering software installed so that we can monitor the sites they are accessing, and we would be alerted should they try to access any inappropriate or illegal websites.

Students are given access to the Nisai Virtual Academy (NVA) with a personalised and unique username and password. Once they have access, they will see all the areas of the NVA including My Learning Zone, Student Email, My assignments, Wellbeing Centre and Social Space. We do have the ability to restrict students from viewing certain areas of the NVA if required. The student email system is restricted to be within Nisai so students cannot send or receive external emails.

Within the learning zone, students can only access the classrooms that they are enrolled in. They cannot enter a classroom until the teacher is present to allow entry, and once a teacher leaves the class is closed. All our lessons are recorded for quality purposes but also to allow us to view the lesson for any evidence in the event of feedback or complaint.

As part of the Nisai induction, students are shown and given access to complete an E-Safety training course and on the wellbeing area of the portal, online security and safety is regularly highlighted.

The social aspect of the NVA is mainly within the classroom area, however the student portal has a social space area where, if they wish, students can join online forums relating to specific areas of interest. Each club has its own purpose e.g., Critter corner where students can share pictures of pets and other students can like or comment. All clubs are moderated by a staff member and students cannot create clubs themselves.

Within the classroom itself, the security and visibility is very controlled. Teachers are responsible for the functionality and interactivity of the lesson and control who can do what. Lessons are conducted using audio and visual aids. We do not use webcams at all in our lessons. With written communication, we can clear the public text chat area if anything inappropriate was to be put in there and students can also privately message the teacher with all logs being stored securely on our servers.

## **Other Related Policies**

NVA Online Delivery – Risk Assessment

CM12 - Behaviour Policy

CM5 - Equality, Racial Equality, Diversity and Inclusion Policy

HR10 - Whistleblowing Policy

HRM3 - Safe Recruitment Policy

SM4 - Complaints Policy

IM19 - Attendance Policy

CM14 - Anti Bullying Policy

Nisai Staff Code of Conduct

## **National Guidance**

- KCSIE Keeping Children Safe in Education 2024  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working together to Safeguard Children 2023  
[https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working\\_together\\_to\\_safeguard\\_children\\_2023.pdf](https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf)
- NSPCC <https://www.nspcc.org.uk/>
- Meeting digital and technology standards in schools and colleges (includes filtering & monitoring and cyber security standards  
<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges> .
- NPCC: When to call the police  
<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf>

## **National Contacts**

- CEOP (Child Exploitation and Online Protection) <http://ceop.police.uk/>
- Professionals Online Safety Helpline – 0844 381 4772 <http://www.saferinternet.org.uk/helpline>
- Internet Watch Foundation (IWF) <http://www.iwf.org.uk/>
- Safer Internet Centre – [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- Childline – 0800 1111 <http://www.childline.org.uk/>
- HM Government (advice on protecting children from radicalisation for parents, teachers, and leaders) [www.educateagainsthate.com](http://www.educateagainsthate.com)
- NSPCC– 24-hour Child Protection Helpline 0808 800 5000
- Women's Aid - 24 Hour Helpline: 0870 2700 123

To be Reviewed: September 2025